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7 **Attorney for Plaintiff TAMARA DOUKAS**

8 **THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISCTRICK OF CALIFORNIA**
10 **DIVISION OF SAN FRANCISCO**

11 TAMARA DOUKAS, an individual,

12 Plaintiff,

13 v.

14 COUNTY OF SAN MATEO, a public entity,
15 PENINSULA HUMANE SOCIETY, a private
16 non-profit organization, DEBI DENARDI, an
17 individual, KIM HADDAD, an individual,
18 KKH INC, a private entity, SPIKE REAL
19 STATE, a private entity, and DOES 1 through
20 50, inclusive,

21 Defendants.

CV 08 2336 SI

PLAINTIFF TAMARA DOUKAS'S
AMENDED/ERRATA INITIAL
DISCLOSURES PER RULE 26(a) and 26(f)

22 Witnesses

23 Tamara Doukas

24 Ann Doukas

25 Steven Doukas

26 All three people above were present the afternoon Kodiak was killed and witnessed the
27 killing as well as statements beforehand and Kodiak's condition.

28 The below people have knowledge about Kodiak's health in the days, weeks and months
preceding his killing.

PLAINTIFF TAMARA DOUKAS'S AMENDED/ERRATA INITIAL DISCLOSURES PER RULE 26(a) and 26(f)

1 Specialist Dr. George Doering 987 Laurel St, San Carlos, CA 94070, 650-598-0968.

2 Specialist Dr. Janet Dunn PO Box 644, San Mateo, CA 94401, 650-839-0323.

3 Scout's House (therapist name unknown) 506 Santa Cruz Avenue, Menlo Park CA 94025,
4 650-328-1430

5 Caroline Kwan 1999 Fernside St, Redwood City, CA 94061, 510-375-7526.

6 Christopher Johnson 1999 Fernside St, Redwood City, CA 94061, 650-208-8101.

7 Specialist Dr. George Doering 987 Laurel St, San Carlos, CA 94070, 650-598-0968.

8 Specialist Dr. Janet Dunn PO Box 644, San Mateo, CA 94401, 650-839-0323

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10
11 Dr. Victoria Sweet, MD
12 (650) 365-2398
13 1947 Alameda de las Pulgas
14 Redwood City, CA 94061

15 b. James Knapp
16 (650) 568-3402
17 1959 Fernside Street
18 Redwood City, CA 94061

19 c. Bea Moore
20 (650) 368-4753
21 1991 Fernside Street
22 Redwood City, CA 94061

23 d. Gertrude Ruschoff
24 (650) 366-4536
25 1951 Fernside Street
26 Redwood City, CA 94061

27 e. Donald Montalvo
28 (650) 375-0600
1967 Fernside Street
Redwood City, CA 94061

f. Brent Roles
(650) 365-5903
165 Woodside Drive
Woodside, CA 94061

1 g. Michelle Schneider and Lin Wang
2 (650) 363-8517
3 1930 Alameda de las Pulgas
4 Redwood City, CA 94061

5 h. Eric and Pamela Schneider
6 (650) 464-4730
7 1975 Fernside Street
8 Redwood City, CA 94061

9 i. Kumutnad Brannan
10 1650 Alameda de las Pulgas
11 Redwood City, CA 94061
12 (650) 367-0374

13 Store employees that saw Kodiak inside or just outside the store on days immediately prior to
14 his death:

15 a. Kristina Ruble
16 (510) 318-0255
17 Pet Food Express
18 372 Woodside Plaza
19 Redwood City, CA 94061

20 b. Paolo Ceccato
21 (650) 591-3355
22 California Carpet
23 695 Industrial Road
24 San Carlos, CA 94070

25 Employees of Peninsula Humane Society are aware of its practices and Denardi's failure to
26 utilize proper procedures. Employees of the San Mateo District Attorney, including Mr.
27 Wagstaffe have knowledge of the incident.

28 Document Production: Plaintiff has already produced documents required by
FRCP26(a)(1)(A)(ii).

Damages Computation:

Medical Bills --- These are expected to increase. Plaintiff believes that defendants have
the current bills and records per their subpoena of same.

Plaintiff has sought medical counseling the records of which have been produced to

1 Defendants. Any billing records should be in those records and have already been disclosed.

2 Loss of Income—Plaintiff currently makes \$3250.00 net per month. Her estimate for her
3 earning capacity with a PhD is \$10,000. This is based on the difference between Plaintiff's likely
4 salary her first year after obtaining her PhD and her actual income. In addition, in the future the
5 income differential will remain and every year she is likely to make less than she would have had
6 she obtained her PhD as scheduled until the last year of her employment.
7

8 Emotional Distress - \$250,000 or more based on Plaintiff's extreme attachment to Kodiak
9 and being forced to watch him forcibly killed.

10 Punitive Damages of \$500,000.00 or greater against PHS.

11 Punitive Damages of \$25,000.00 against Debi Denardi.

12 Punitive Damages of \$35,000.00 against Kim Haddad.

13 Statutory Damages against each defendant as permitted by Civil Code 52.1 and 52
14 including \$25,000 per liable defendant and three times actual damage but not less than \$4,000
15 against each defendant. Actual damage means all compensatory damages alleged above and
16 shown by the evidence at trial.
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20 Dated: August 11, 2008

_____s/s_____

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22 Daniel Berko, Attorney for Plaintiff,
23 Tamara Doukas
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